

Bradford J. Sandler (NY Bar No. 4499877)
Ilan D. Scharf, Esq. (NY Bar No. 4042107)
Jason S. Pomerantz, Esq. (CA Bar No. 157216)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777

Counsel to Plaintiff RDC Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

In re: ROCHESTER DRUG CO-OPERATIVE, INC. Debtor.	Chapter 11 Case No. 20-20230 (PRW)
Advisory Trust Group, LLC, as trustee of the RDC LIQUIDATING TRUST, Plaintiff, v. ASTRAZENECA LP, Defendant.	Adv. Proc. No. 22-02008 (PRW)

SECOND STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc. (“Debtor”), and defendant, Astrazeneca LP, (“Defendant” and, together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate and agree:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendant;

WHEREAS, the summons (the “Summons”) was issued on February 4, 2022;
WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;
and

WHEREAS, on February 22, 2022, the Parties entered into a stipulation (the “First Stipulation”) by which the time required for Defendant to answer the Complaint was extended through and including April 15, 2022. The First Stipulation was approved by order entered February 23, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject to Court approval, to further extend the time for the Defendant to answer the Complaint to and including July 15, 2022.
2. All other terms set forth in the First Stipulation remain in full force and effect.

Dated: April 13, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf
Bradford J. Sandler (NY Bar No. 4499877)
Ilan D. Scharf (NY Bar No. 4042107)
Jason S. Pomerantz (CA Bar No. 157216)
780 Third Avenue, 34th Floor
New York, NY 10017
Telephone: (212) 561-7700
Email: bsandler@pszjlaw.com
ischarf@pszjlaw.com
jspomerantz@pszjlaw.com

Counsel to Plaintiff RDC Liquidating Trust

Dated: April 10, 2022

HARRIS BEACH PLLC

/s/ Brian D. Roy
Brian D. Roy (NY Bar No. 4981825)
333 West Washington Street, Suite 200
Syracuse, NY 13202
Telephone: (315) 214-2052
Email: broy@harrisbeach.com

Counsel to Defendant AstraZeneca, LP

SO ORDERED:

DATED: _____, 2022
Rochester, New York

HON. PAUL R. WARREN
United States Bankruptcy Judge